

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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VICTOR ZAVALA, EUNICE GOMEZ, ANTONIO :
FLORES, OCTAVIO DENISIO, HIPOLITO :
PALACIOS, CARLOS ALBERTO TELLO, :
MAXIMILIANO MENDEZ, ARTURO ZAVALA, :
FILIPE CONDADO, LUIS GUTIERREZ, DANIEL :
ANTONIO CRUZ, PETR ZEDNEK, TERESA JAROS, :
JIRI PFAUSER, HANA PFAUSEROVA, PAVEL :
KUNC and MARTIN MACAK, on behalf of themselves :
and all others similarly situated, :
:
Plaintiffs, :
- against - :
:
WAL-MART STORES, INC., :
:
Defendant. :
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Civil Action No.
03-Civ-5309 (JAG)

AMICUS CURIAE BRIEF OF THE CZECH REPUBLIC

**On Plaintiffs' Motion For Facilitated Notice and Discovery and Defendants'
Motion to Dismiss (Returnable 10/20/04)**

Michaelene Loughlin, Esq., 2678
Loughlin & Latimer
131 Main Street, Suite 235
Hackensack, New Jersey 07601
(201) 487-9797

Interest of *Amicus Curiae*

The Embassy of the Czech Republic avails itself this opportunity to present its compliments to the honorable Court and has the privilege to submit an *amicus* brief on behalf of the citizens of the Czech Republic - plaintiffs in the case *Zavala, et al. V. Wal-Mart Stores, Inc.*

Argument

We would like to stress that this *amicus* brief should not in any way imply that the Czech Republic approves, condones, promotes or in any other way deliberately or unintentionally supports unlawful activities of its citizens on the territory of the United States. To the contrary, the Government of the Czech Republic deplores the fact the majority of its citizens taking part in this case may not have observed United States immigration law and may have overstayed their United States visa and/or participated in gainful activity in violation of their visa status.

However:

- having in mind the existence of the international human rights conventions which set universally recognized standards for all human beings including illegal migrant workers
- being aware of the difficult situation, which some illegal migrant workers in the United States face, *e.g.*, cultural and linguistic isolation, living in servitude-like conditions and at the same time fearful to resort to law enforcement authorities
- and acknowledging that at least some of the plaintiffs' claims in the present case generally do correspond with the knowledge of the Czech Government of the situation of migrant workers

the Embassy of the Czech Republic in Washington, D.C. respectfully submits to the honorable Court that the Czech Government has closely followed and will follow all future proceedings of the *Zavala, et al. v. Wal-Mart Stores, Inc.*

At the same time, it is our firm belief that it is in the interest of all parties to the present case to properly examine and evaluate, before the honorable Court, the extent of alleged violations of the United States law and international human rights standards, if any, on the part of defendant.

Loughlin & Latimer
131 Main Street, Suite 235
Hackensack, New Jersey 07601
(201) 487-9797

Dated: 10/11/04

By: Michaelene Loughlin
Michaelene Loughlin
Attorney for *Amicus Curiae*

Embassy of the Czech Republic
3900 Spring of Freedom Street, N.W.
Washington, D.C. 20008